

EXHIBIT 2

Ada Verloren

From: Ada Verloren
Sent: Thursday, November 06, 2014 3:00 PM
To: 'Miglio, Terrence J.'
Cc: Buchanan, Barbara E.; Keith Flynn
Subject: Henry Ford discovery responses

Mr. Miglio:

We have reviewed Defendant's supplemental responses to Plaintiff's first set of interrogatories and requests for production of documents but Defendant still does not respond to many of the discovery requests. A basic problem is that many of the documents are illegible because the font is so small and the reproduction quality is so poor. Plaintiff therefore asks Defendant to provide acceptable copies of the following documents: HFH03-09, 10-18, 19-25, 27, 165-169, 188-191, 195, 196-265.

Defendant's inadequate responses include the following:

Interrogatories

3. Persons who participated in decision to terminate Plaintiff: Defendant does not identify the nature of the input, the dates on which discussions took place, witnesses/participants to each discussion.
4. Lawsuits re WPA and FLSA: Defendant does not respond.
5. Complaints about lunch breaks: Defendant does not respond.
6. Employees terminated: Defendant does not respond.
7. Bork's information about Plaintiff's intention to file paperwork with State of Michigan: Defendant's answer is evasive.
8. Relationship between Henry Ford Hospital, Medical Laboratories, and Health System: Defendant's answer is vague and incomplete.
9. Bork's phone numbers: Defendant does not respond.
10. Defendant denies as untrue almost every allegation in Plaintiff's complaint: Defendant fails to explain why it claims every allegation is untrue.
11. Witnesses: Defendant does not respond.

Requests for Production

35. Lawsuits re WPA or FLSA
36. Telephone records
37. Emails and text messages from and to Bork during the period from 60 days prior to 60 days after Plaintiff's discharge.

Please supplement by providing complete responses to Plaintiff's discovery requests. Otherwise, Plaintiff will have no other option but to continue with her motion to compel and to ask for court intervention.

Please do not hesitate to contact me if you have any questions or comments.

Sincerely,

Ada Verloren

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